

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:25-MJ-292
)	
STEPHEN CHADWICK HOWELL,)	<u>UNDER SEAL</u>
)	
<i>Defendant.</i>)	
_____)	

**AFFIDAVIT IN SUPPORT OF A
CRIMINAL COMPLAINT AND AN ARREST WARRANT**

I, Matthew U. Lariccia, being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and I have been so employed since 2009. As part of my duties as a Special Agent, I am assigned to investigate violations of federal law, including the online sexual exploitation of children. This includes violations pertaining to the illegal possession, receipt, distribution, transmission, advertisement, and production of material depicting the sexual exploitation of minors. I have had numerous hours of professional law enforcement training in the detection and investigation of criminal offenses. I have training and experience in the enforcement of the laws of the United States, including the preparation, presentation, and service of subpoenas, affidavits, criminal complaints, search warrants, and arrest warrants. As a federal agent, I am authorized to investigate violations of laws of the United States and, as a law enforcement officer, I am authorized to execute warrants issued under the authority of the United States.

2. The facts and information in this affidavit are based upon information that I obtained during this investigation and information that has been provided to me by other law enforcement sources. Since this affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for this application.

3. I submit this affidavit in support of a criminal complaint and an arrest warrant charging STEPHEN CHADWICK HOWELL (“HOWELL”), a resident of Arlington, Virginia, which is within the Eastern District of Virginia, with the Destruction or Removal of Property to Prevent Seizure, in violation of 18 U.S.C. § 2232(a). For the reasons set forth below, I submit that probable cause exists to believe that on or about May 7, 2025, HOWELL did knowingly destroy or damage, or attempt to destroy or damage, his laptop computer during the execution of a residential search warrant for the purpose of preventing or impairing the Government’s lawful authority to take such property into its custody or control.

STATUTORY AUTHORITY

4. Title 18, United States Code, Section 2232(a) states that “[w]hoever, before, during, or after any search for or seizure of property by any person authorized to make such search or seizure, knowingly destroys, damages, wastes, disposes of, transfers, or otherwise takes any action, or knowingly attempts to destroy, damage, waste, dispose of, transfer, or otherwise take any action, for the purpose of preventing or impairing the Government’s lawful authority to take such property into its custody or control or to continue holding such property under its lawful custody and control, shall be fined under this title or imprisoned not more than 5 years, or both.”

STATEMENT OF PROBABLE CAUSE

5. As detailed further below, between January 2023 and January 2024, HOWELL, a now 24-year-old male, and J.D.,¹ an adult male located in Brooklyn, New York, engaged in chat conversations using Telegram.² A review of the Telegram conversations between HOWELL and J.D. revealed that they discussed the collection and distribution of child pornography. On several occasions, HOWELL sent J.D. files that appeared based on the context to contain child pornography. HOWELL and J.D. shared with one another methods to manipulate minor females into producing and providing child pornography to them. At HOWELL's request, J.D. instructed HOWELL in techniques to avoid detection and encrypt electronic data.

6. J.D. is the subject of an investigation conducted by the FBI's New York Division into whether J.D. was producing child pornography with multiple minors on various social media and messaging platforms. On November 19, 2024, the FBI's New York Division executed a search warrant on J.D.'s residence. The warrant was issued on November 13, 2024, by the Honorable Robert M. Levy, United States Magistrate Judge, United States District Court for the Eastern District of New York (1:24-MC-425). In addition to authorizing the search of J.D.'s residence the warrant also authorized the search of electronic devices located in the residence. J.D.'s cellular telephone was seized and searched pursuant to the warrant.

¹ I am aware of J.D.'s identity based on information provided to me by the FBI's New York Division.

² Telegram is an encrypted messaging application available for free. Telegram allows users to send text messages as well as photo and video files. End to end encryption is designed to safeguard user privacy.

7. The search of J.D.'s cellular telephone resulted in the identification of Telegram chats between J.D. and a Telegram user, later identified as HOWELL, utilizing at least two usernames.

The Telegram Chats

8. Between January 6, 2023, and July 16, 2023, HOWELL engaged in a Telegram chat with J.D. During that period, HOWELL utilized the Telegram account identified by account number 623823871. The username associated with that account was @shaggyrogers1812. Between August 13, 2023, and January 31, 2024, HOWELL engaged in another chat with J.D., this time using the Telegram account identified by account number 6374984776. The username associated with that account was @tuggspeedman11.

9. A review of the chats between HOWELL and J.D. revealed that they discussed the collection and distribution of child pornography, methods to persuade minor females to produce child pornography, and means and methods to encrypt and hide their child pornography collections.

10. In their chats, HOWELL and J.D. discussed the age of the minor females featured in the child pornography they have collected and shared with one another.³ For example, on January 6, 2023, HOWELL sent J.D. an mp4 video file⁴ along with the comment, “[redacted] 1 6.” Based on my training and experience investigating the collection and distribution of child pornography utilizing the Internet, I know that subjects will often try to avoid automated

³ Quotes reproducing chat messages between HOWELL and J.D. contain typographical errors which appeared in the quotes. For ease of reading, I have not marked each typographical error with “sic.”

⁴ I was unable to view the video file for technical reasons.

detection of their activities by app providers by placing spaces between numbers in the age of a minor, as in this case, where a space appears between 1 and 6.

11. On April 25, 2023, HOWELL sent J.D. a screenshot from an X (formerly Twitter) account. The screenshot included a photograph of a female inserting an object into her anus. The screenshot included the words, “ur fav teen pornstar 19.” HOWELL sent the following text with the screenshot, “there is some hot stuff on here u may like, she is 1 4 not 19 lol.”

12. On April 21, 2023, HOWELL sent J.D. the following messages: “and yh⁵ I think ness quit sellin again mom found her nudes, which sucks cos i was waiting to get a custom from her bur hopefully she is doin alright cos that’s gotta suck.” J.D. responded, “Lol. She not doing any custom. Found them again lols. I mean what would you do if your child kewps doing stuff.”

13. On June 22, 2023, HOWELL sent J.D. a movie file with the accompanying text, “god ness is so hot, such a shame her mom caught her again.” When J.D. later asked HOWELL if the video was new, HOWELL responded, “no it is from when she was selling but i don’t think she posted in group im pretty sure i paid for it. i still chat to her sometimes but she isnt sending me stuff but hopefully she will make an only fans when shes of age n then she will have mofe stuff.”

14. At the end of May 2023 and the beginning of June 2023, HOWELL discussed sending J.D. videos, which are known to law enforcement to contain child pornography. On May 30, 2023, HOWELL wrote to J.D., “also sorry bro i still gotta send the ruben stuff thru, just been busy and been spending a lot of time tryna make more space on my hard drive then i start exportin and it goes away lol but i still have so many duplicates so it will b ez to make more space.” On June 3, 2023, HOWELL wrote J.D., “and it was [redacted] or something like that

⁵ “yh” is used to refer to “yeah.”

folder that i zipped that was too big will zip some more and ill have to rezip that [redacted] one but split it into 2.”⁶

15. Ruben Oswaldo Yaverino Rosales was a Mexican national who was extradited to the U.S. and convicted for producing child pornography. Ruben’s victims were teenage girls. The victims featured in Ruben’s child pornography are known among persons who collect child pornography as “Ruben’s girls.” [Redacted] was one of Ruben’s victims. On June 5, 2023, HOWELL sent J.D. a zip file titled “ruben [redacted]” On January 26, 2023, HOWELL told J.D. he has a Mega⁷ link containing Ruben videos, “and lemme see if i have a ruben mega. im pretty sure i did but then it got taken down.”

16. On October 26, 2023, HOWELL forwarded J.D. a file attachment with the title “12yo [redacted] gets caught fingering pussy on cam-quicktime.mov.” The thumbnail image accompanying the forwarded file features a clothed female who appears to be a minor. The word “Omegle” appears in the lower left corner of the thumbnail image. Omegle was a free, web-based online chat service that allowed users to socialize with others without the need to register. The service randomly paired users in one-on-one chat sessions where they could chat anonymously. It operated from 2009 to 2023. Omegle was known to be utilized by child predators as a platform for obtaining child pornography and exploiting minors to produce child pornography.

17. In their Telegram chats, HOWELL and J.D. discussed their collections of child pornography. HOWELL and J.D. referred to child pornography as “sauce.” In June 2023, J.D.

⁶ In the chat, HOWELL used the actual name of the victim, redacted here for her protection.

⁷ Mega is a file hosting service located in New Zealand. Persons who collect child pornography are known to store child pornography on Mega and to share with one another links to folders containing child pornography.

told HOWELL he wanted to rob him. When HOWELL said, “of some sauce?” J.D. responded, “For sauce. You are main source and can keep up with stuff more than me.”

18. The chats between HOWELL and J.D. indicate that after July 2023, HOWELL deleted or otherwise divested himself of his child pornography collection. On October 4, 2023, J.D. wrote, “What have you been doing? Hiding from FBI lol.” On October 14, 2023, J.D. wrote, “Oh you nuked the linux drive too?” to which HOWELL responded, “yep which was very unnecessary but at the time i told myself i was done. and i was thinking that if u ever disappeared i wouldnt rllly understand any of this and i wouldnt know how to do shit.”

19. In chats between August 2023 and January 2024, HOWELL discussed rebuilding his collection and asked J.D. for assistance in rebuilding it. On October 7, 2023, HOWELL asked J.D., “u have any rarer groups or content,” to which J.D. responded, “Ha. Nope. Most anything i was in was nuked.” HOWELL responded, “i feel ya. i got rllly lucky to find tht ari group. Or i guess not find i was sent by someone i used to chat to.” The following chat occurred in December 2023:

J.D.: Have you been recreating your collection.

HOWELL: ehh i have my own group on tele where i send some stuff. wbu have u been collecting stuff lately.⁸

J.D.: I went on a random pedo chat and met this 15 yo Italian girl. What luck.

HOWELL: lucky. where is tht chat?

J.D.: TOR. She was advertising. I was looking to keep my links updated.

HOWELL: shitt nice man, be careful tho. the Italian girl send u anything?

J.D.: Yeah.

...

SUBJECT: u have anything u could share with no face? if u don’t want to i understand.

⁸ “wbu” stands for “what about you.”

20. As described above, on October 26, 2023, HOWELL forwarded J.D. a file attachment with the title, “12yo [redacted] gets caught fingering pussy on cam-quicktime.mov,” indicating that by that time, HOWELL had been rebuilding his collection of child pornography.

21. During their Telegram chats, HOWELL and J.D. discussed requesting child pornography from minor females and tactics and techniques for convincing minor females to produce child pornography. For example, on April 25, 2023, HOWELL told J.D., “also i ordered a custom from girl u sent me on reddit, thanks for that bro.” Based on my training and experience, I know that “custom” in this context refers to ordering a video or photograph from a minor. Persons that order customs often request the minor engage in a specified sexual act or pose in a specified sexually explicit position. Later, J.D. asked HOWELL, “Did you try that reddit girl,” to which HOWELL responded, “yh i mssged her again and then she replied a few weeks ago so hopefully she will send soon.”

22. In July 2023, HOWELL and J.D. engaged in a discussion about whether or not disclosing their real age to a minor female would harm their chances of obtaining child pornography from the minor female.

HOWELL: since uve been in the ‘game’ longer than me what do u recommend with tellin girls ur actual age cos at first i say im younger obviously. then usually once i get closer i tell em my real age but every time i do im afraid ill lose them if ygm.⁹ there is one girl i mentioned recently who switched up, i wanna tell her the truth but i also don’t wanna lose her cos shes fckn hot. i think with this girl imma wait a bit longer and them imma probably let her know cos i feel lying to her but at same time im like fckk idk.¹⁰

J.D.: What kind of age are you telling them? Ive been relatively close in age to all the ones I’ve dealt with. Most have no issue with anyone like early 20s to 25. More a US thing. European girls don’t care as much. 16 will do 20s not problem.

⁹ “ygm” stands for “you get me.”

¹⁰ “idk” stands for “I don’t know.”

HOWELL: very true. yh most girls i told didnt even care but idk if this girl will. i am telling her i am gonna b a senior in hs.

J.D.: Damn. You must look younger than me then. I cant pull that off. Minimum 20/21. Maybe 19 when q nice cut and shave.

HOWELL: idk how old I look but some girls have said i am cappin¹¹ and some dont know the difference. im early 20s and yh a fresh shave definitely helps.

23. During the course of their Telegram chats, J.D. instructed HOWELL on how to encrypt his computer files and how to utilize TOR to access the dark web. HOWELL and J.D. also discussed the use of virtual currency to pay for access to a dark-web site they refer to as AIW. Among persons who collect child pornography, AIW is known to stand for “Alice in Wonderland,” a dark-web site that is known to have housed child pornography. Visitors to the site could pay using virtual currency to access child pornography not available to all users of the site. In June 2023, HOWELL and J.D. discussed using virtual currency and using a service called Monero to hide the transactions.¹²

HOWELL: and u used monero for aiw?

J.D.: Yea sir. Just make a note of your transaction id. I let a friend buy the btc. Send to me then I transferred it to monero. Deniability.

...

HOWELL: so i can send you btc and then u can send in the monero for me for aiw. im down to do that but how could u submit for me. would u just have to send my username with it.

HOWELL then proceeded to request a virtual wallet address from J.D. J.D. sent HOWELL the Bitcoin address and they discussed the transaction amount.

¹¹ “Cappin” is slang for “lying.”

¹² Monero is a cryptocurrency which uses a blockchain with privacy-enhancing technologies to obfuscate transactions to achieve anonymity and fungibility.

Identification of HOWELL

24. According to a response received from Telegram, the same telephone number was associated with both Telegram accounts with which J.D. was chatting, @shaggyrogers1812 and @tuggspeedman11. That telephone number ended in 2898. After execution of the search warrant described below, law enforcement were able to confirm that the cell phone found in HOWELL's possession, in his bedroom, is the number ending in 2898.

25. AT&T was identified as the service provider of the telephone account associated with the telephone number ending in 2898. In response to legal process AT&T reported Chad HOWELL is the user of the account. Chad is an abbreviation of Chadwick, HOWELL's middle name. The user address associated with the account is an address on N. Abingdon Street, in Arlington, in the Eastern District of Virginia.

26. HOWELL's Virginia driver's license lists the N. Abingdon Street locations as his physical address. A search of the Virginia Department of Motor Vehicles databases conducted on March 31, 2025, returned a vehicle registered to HOWELL at that location. On April 2, 2025, the vehicle was observed parked on the street in front of that location.

Search Warrant Execution

27. On May 1, 2025, the Honorable William E. Fitzpatrick, U.S. Magistrate Judge, United States District Court for the Eastern District of Virginia issued search warrants for the N. Abingdon Street residence (1:25-SW-387) and the person of HOWELL (1:25-SW-387). Given the nature of the crimes under investigation, these warrants specifically covered any and all electronics belonging to HOWELL.

28. On May 7, 2025, at approximately 6:00 AM, the FBI's Washington Field Office Child Exploitation and Human Trafficking Task Force ("CEHTTF") attempted to execute the

search warrants at the N. Abingdon Street residence. Members of the FBI's Washington Field Office Special Weapons and Tactics Team were wearing patches on their chests, backs, and arms indicating that they were FBI. Team members knocked loudly on the side door of the N. Abingdon Street residence and announced that they were FBI with a warrant. Law enforcement then breached the door and continued to announce that they had a warrant; they also activated emergency lights on all law enforcement vehicles at the scene. All other four members of the household except for HOWELL complied with the FBI's orders to depart the residence.

29. While attempting to secure HOWELL's residence, law enforcement, from the exterior of the residence, observed HOWELL come down from the upstairs in response to the search warrant execution and retrieve two large knives from the kitchen. HOWELL walked around the kitchen area with the knives before retreating to his upstairs bedroom where he barricaded himself until he surrendered without further incident approximately ten hours later in the mid-afternoon. During the course of the standoff, HOWELL told the negotiator that he did not want to be raped and murdered in prison. In my training and experience, I believe that HOWELL was referring to the common belief that if arrested for a sex crime against a child he would be mistreated by other inmates in prison.

30. After the residence was secured, the CEHTTF finished executing the original search warrant. During the search of HOWELL's bedroom, where HOWELL had been barricaded during the day, a closed laptop was observed in an open-storage area underneath his bed. When law enforcement retrieved the laptop, an unknown liquid poured from the keyboard area of the closed laptop, onto the bedroom floor, in an apparent effort by HOWELL to destroy evidence of his criminal activity described above. Although the type of liquid is unknown at this

time, HOWELL had access to bottled water during this time, and law enforcement found an empty beer can and containers of urine in the room. The laptop is depicted below at the scene:





31. The laptop was subsequently bagged and seized and treated as a bio-hazard due to the unknown liquid. It is currently located at the FBI's Washington Field Office Northern Virginia Resident Agency, 9325 Discovery Boulevard, Manassas, Virginia 20109.

32. Due to the laptop's condition, the FBI's Washington Field Office Computer Analysis Response Team initiated their protocols for electronics that have been exposed to a liquid in effort to prevent damage or further damage to the laptop and to preserve potential evidence located on the laptop.

CONCLUSION

5. Based on the foregoing, I submit that there is probable cause to believe that on or about May 7, 2025, HOWELL did knowingly destroy or damage, and attempt to destroy or damage, a laptop computer during the execution of a residential search warrant for the purpose of preventing or impairing the Government's lawful authority to take such property into its custody

or control, in violation of 18 U.S.C. § 2232(a), and I respectfully request that a criminal complaint and arrest warrant be issued for HOWELL.

Respectfully submitted,

Matthew G. Lariccia
Matthew Lariccia, Special Agent
Federal Bureau of Investigation

Respectfully submitted and attested to in accordance with the requirements of Fed. R. Crim. P. 41 via telephone on May 9, 2025.

Lindsey R Vaala  Digitally signed by Lindsey R Vaala
Date: 2025.05.09 14:02:13 -04'00'

The Honorable Lindsey R. Vaala
United States Magistrate Judge